09/665,846

## REMARKS

Reconsideration of the application in view of the present amendment is respectfully requested.

Claims 3-6, 8, 15-18, and 20 are canceled. Claims 1, 2, 7, 9-14, 19, and 21-24 are amended. New claims 25 and 26 are added. Accordingly, claims 1, 2, 7, 9-14, 19, and 21-26 are pending.

Claim 1 recites a method of operating an image-based item processing system to process an entry which is a unit of work comprising a plurality of batches of physical document items. The method comprises (a) determining whether a group of physical tracer document items is associated with the entry, and (b) associating a unique group of logical tracer document items with the entry when the determination in (a) is negative.

Applicant would like to respectfully point out that the rejection of claim 1 made in the Office Action is improper for reasons explained hereinbelow.

First, Applicant notes from the Office Action that the Examiner refers specifically to paragraphs 0035 and 0036 of Geisel et al. (referred to herein as "Geisel") to reject claim 1 of the present application. However, Applicant would like to respectfully point out that paragraphs 0035 and 0036 of Geisel discloses confidence-based codeline matching logic which provides an algorithm to resolve unreadable characters between versions of check codelines, especially those captured during multiple sorter passes. Paragraphs 0035 and 0036 of Geisel have nothing at all to do with "a method of operating an image-based item processing system to process an entry which is a unit of work comprising a plurality of batches of physical document items", as recited in the preamble of claim 1 of the present application.

Second, Applicant would like to respectfully point out that nowhere does Geisel discloses or suggests "determining whether a group of physical tracer document items is associated with an entry which is a unit of work comprising a plurality of batches of physical document items". More specifically, nowhere does Geisel discloses or suggests "(a) determining whether a group of physical tracer document items is associated with the entry", as recited in claim 1 of the present application.

9

Third, since Geisel neither discloses nor suggests "(a) determining whether a group of physical tracer document items is associated with the entry", Geisel cannot disclose or suggest "(b) associating a unique group of logical tracer document items with the entry when the determination in (a) is negative", also as recited in claim 1 of the present application.

If the Examiner continues to reject claim 1 by applying Geisel, it is respectfully requested that he (i) explain how a process of resolving unreadable characters between versions of check codelines has anything to do with "a method of operating an image-based item processing system to process an entry which is a unit of work comprising a plurality of batches of physical document items", (ii) specifically point out where Geisel discloses or suggests "(a) determining whether a group of physical tracer document items is associated with the entry", and (iii) specifically point out where Geisel discloses or suggests "(b) associating a unique group of logical tracer document items with the entry when the determination in (a) is negative". Absent an adequate explanation, it is respectfully submitted that the rejection of claim 1 is improper and, therefore, should be withdrawn.

None of the prior art including the prior art references of record discloses or suggests a method of operating an image-based item processing system to process an entry which is a unit of work comprising a plurality of batches of physical document items, wherein the method comprises (a) determining whether a group of physical tracer document items is associated with the entry, and (b) associating a unique group of logical tracer document items with the entry when the determination in (a) is negative. Thus, claim 1 patentably defines over the prior art including the prior art references of record, whether taken singularly or in combination, and is therefore allowable.

Claim 2 recites a method of operating a distributed image capture proof-of-deposit system having a central processing site and a number of branches connected via a network with the central processing site. The method comprises the steps of (a) capturing at a branch images of a plurality of batches of physical document items associated with an entry without using a group of physical tracer document items, (b) transferring the captured images from the branch via the network to the central processing site, (c) receiving at the central processing site the images transferred from the branch, and (d) associating a unique logical

10

group of tracer document items with the images received at the central processing site so as to allow the received images of physical document items to be later processed as if the plurality of batches of physical document items associated with the entry had been processed with a unique group of physical tracer document items.

None of the prior art including the prior art references of record discloses or suggests a method of operating a distributed image capture proof-of-deposit system having a central processing site and a number of branches connected via a network with the central processing site, wherein the method comprises, inter alia, the step of "(d) associating a unique logical group of tracer document items with the images received at the central processing site so as to allow the received images of physical document items to be later processed as if the plurality of batches of physical document items associated with the entry had been processed with a unique group of physical tracer document items". Thus, claim 2 patentably defines over the prior art including the prior art references of record, whether taken singularly or in combination, and is therefore allowable.

Claim 7 recites a method of operating an image capture proof-of-deposit system at a central processing site to process a plurality of batches of physical document items associated with an entry without using a group of physical tracer document items. The method comprises the steps of (a) capturing images of the physical document items, and (b) associating a unique group of logical tracer document items with the captured images of physical document items so as to allow the captured images to be later processed as if the physical document items associated with the entry had been processed with a unique group of physical tracer document items.

None of the prior art including the prior art references of record discloses or suggests a method of operating an image capture proof-of-deposit system at a central processing site to process a plurality of batches of physical document items associated with an entry without using a group of physical tracer document items, wherein the method comprises the steps of (a) capturing images of the physical document items, and (b) associating a unique group of logical tracer document items with the captured images of physical document items so as to allow the captured images to be later processed as if the physical document items associated

11

with the entry had been processed with a unique group of physical tracer document items. Thus, claim 7 patentably defines over the prior art including the prior art references of record, whether taken singularly or in combination, and is therefore allowable.

Claim 9 recites a method of operating an encoding workstation of an image-based item processing system to process physical document items which are contained in a number of document trays without using a group of physical tracer document items in the document trays. The method comprises the steps of (a) determining whether a group of physical tracer document items is included in a tray of physical document items, and (b) associating a unique group of logical tracer document items with the tray of physical document items when the determination in step (a) is negative.

None of the prior art including the prior art references of record discloses or suggests a method of operating an encoding workstation of an image-based item processing system to process physical document items which are contained in a number of document trays without using a group of physical tracer document items in the document trays, wherein the method comprises the steps of (a) determining whether a group of physical tracer document items is included in a tray of physical document items, and (b) associating a unique group of logical tracer document items with the tray of physical document items when the determination in step (a) is negative. Thus, claim 9 patentably defines over the prior art including the prior art references of record, whether taken singularly or in combination, and is therefore allowable.

Applicant notes from the Office Action that the Examiner refers specifically to paragraph 0036 and Table 1 of Geisel to reject claim 10, and paragraphs 0036-0039 and Table 1 of Geisel to reject claims 11 and 12. Applicant would like to respectfully point out that the rejection of claims 10, 11, and 12 made in the Office Action is improper for reasons explained hereinbelow.

First, Applicant would like to respectfully point out that paragraphs 0036-0039 and Table 1 of Geisel discloses a confidence-based codeline matching algorithm which applies a confidence value to each field of a check, and the individual confidence values are summed to derive an overall confidence value for the check's codeline. Paragraphs 0036-0039 and Table 1 of Geisel have nothing at all to do with "assigning a logical pocket number to each

12

logical tracer document item in the unique group of logical tracer document items", as recited in each of claims 10, 11, and 12 of the present application. If the Examiner continues to reject claims 10, 11, and 12 by applying Geisel, it is respectfully requested that he explain where Geisel discloses or even remotely suggests "a logical tracer document item" and "a logical pocket number which is assigned to a logical tracer document item". Applicant submits that Geisel does not even disclose or suggest "a logical tracer document item", let alone "a logical pocket number which is assigned to a logical tracer document item".

Second, claim 11 depends from claim 10 and is allowable for the reasons claim 10 is allowable and for the specific limitations recited therein. Claim 11 further recites the step of (d) for each logical tracer document item, encoding a physical blank document item with information associated with the particular logical tracer document item. None of the prior art including the prior art references of record discloses or suggests the structure recited in claim 11 in combination with the structure recited in claim 10. Thus, claim 11 patentably defines over the prior art including the prior art references of record, whether taken singularly on in combination, and is therefore allowable.

Third, claim 12 depends from claim 11 and is allowable for the reasons claim 11 is allowable and for the specific limitations recited therein. Claim 12 further recites the step of (e) for each encoded item of step (d), routing the encoded physical document item to a physical pocket which has been assigned the logical pocket number of step (c). None of the prior art including the prior art references of record discloses or suggests the structure recited in claim 12 in combination with the structure recited in claim 11. Thus, claim 12 patentably defines over the prior art including the prior art references of record, whether taken singularly on in combination, and is therefore allowable.

Claim 13 recites an image-based item processing system for processing an entry which is a unit of work comprising a plurality of batches of physical document items. The system comprises means for determining whether a group of physical tracer document items is associated with the entry, and means for associating a unique group of logical tracer document items with the entry when the determination is negative.

13

None of the prior art including the prior art references of record discloses or suggests an image-based item processing system for processing an entry which is a unit of work comprising a plurality of batches of physical document items, wherein the system comprises means for determining whether a group of physical tracer document items is associated with the entry, and means for associating a unique group of logical tracer document items with the entry when the determination is negative. Thus, claim 13 patentably defines over the prior art including the prior art references of record, whether taken singularly or in combination, and is therefore allowable.

Claim 14 recites a distributed image capture proof-of-deposit system having a central processing site and a number of branches connected via a network with the central processing site. The system comprises means for capturing at a branch images of a plurality of batches of physical document items associated with an entry without using a group of physical tracer document items, means for transferring the captured images from the branch via the network to the central processing site, means for receiving at the central processing site the images transferred from the branch, and means for associating a unique logical group of tracer document items with the images received at the central processing site so as to allow the received images of physical document items to be later processed as if the plurality of batches of physical document items associated with the entry had been processed with a unique group of physical tracer document items.

None of the prior art including the prior art references of record discloses or suggests a distributed image capture proof-of-deposit system having a central processing site and a number of branches connected via a network with the central processing site, wherein the system comprises, inter alia, means for associating a unique logical group of tracer document items with the images received at the central processing site so as to allow the received images of physical document items to be later processed as if the plurality of batches of physical document items associated with the entry had been processed with a unique group of physical tracer document items. Thus, claim 14 patentably defines over the prior art including the prior art references of record, whether taken singularly or in combination, and is therefore allowable.

14

09/665,846

Claim 19 recites an image capture proof-of-deposit system at a central processing site for processing a plurality of batches of physical document items associated with an entry without using a group of physical tracer document items. The system comprises means for capturing images of the physical document items, and means for associating a unique group of logical tracer document items with the captured images of physical document items so as to allow the captured images to be later processed as if the physical document items associated with the entry had been processed with a unique group of physical tracer document items.

None of the prior art including the prior art references of record discloses or suggests an image capture proof-of-deposit system at a central processing site for processing a plurality of batches of physical document items associated with an entry without using a group of physical tracer document items, wherein the system comprises means for capturing images of the physical document items, and means for associating a unique group of logical tracer document items with the captured images of physical document items so as to allow the captured images to be later processed as if the physical document items associated with the entry had been processed with a unique group of physical tracer document items. Thus, claim 19 patentably defines over the prior art including the prior art references of record, whether taken singularly or in combination, and is therefore allowable.

Claim 21 recites an encoding workstation of an image-based item processing system for processing physical document items which are contained in a number of document trays without using a group of physical tracer document items in the document trays. The encoding workstation comprises means for determining whether a group of physical tracer items is included in a tray of physical document items, and means for associating a unique group of logical tracer document items with the tray of physical document items when the determination is negative.

None of the prior art including the prior art references of record discloses or suggests an encoding workstation of an image-based item processing system for processing physical document items which are contained in a number of document trays without using a group of physical tracer document items in the document trays, wherein the encoding workstation

15

comprises means for determining whether a group of physical tracer items is included in a tray of physical document items, and means for associating a unique group of logical tracer document items with the tray of physical document items when the determination is negative. Thus, claim 21 patentably defines over the prior art including the prior art references of record, whether taken singularly or in combination, and is therefore allowable.

Claim 22 depends from claim 21 and is allowable for the reasons claim 21 is allowable and for the specific limitations recited therein. Claim 22 further recites means for assigning a logical pocket number to each logical tracer document item in the unique group of logical tracer document items. None of the prior art including the prior art references of record discloses or suggests the structure recited in claim 22 in combination with the structure recited in claim 21. Thus, claim 22 patentably defines over the prior art including the prior art references of record, whether taken singularly on in combination, and is therefore allowable.

Claim 23 depends from claim 22 and is allowable for the reasons claim 22 is allowable and for the specific limitations recited therein. Claim 23 further recites, for each logical tracer document item, means for encoding a physical blank document item with information associated with the particular logical tracer document item. None of the prior art including the prior art references of record discloses or suggests the structure recited in claim 23 in combination with the structure recited in claim 22. Thus, claim 23 patentably defines over the prior art including the prior art references of record, whether taken singularly on in combination, and is therefore allowable.

Claim 24 depends from claim 23 and is allowable for the reasons claim 23 is allowable and for the specific limitations recited therein. Claim 24 further recites, for each encoded item, means for routing the encoded physical document item to a physical pocket which has been assigned the corresponding logical pocket number assigned thereto. None of the prior art including the prior art references of record discloses or suggests the structure recited in claim 24 in combination with the structure recited in claim 23. Thus, claim 24 patentably defines over the prior art including the prior art references of record, whether taken singularly on in combination, and is therefore allowable.

Claim 25 recites a method of operating a distributed image capture proof-of-deposit system having a central processing site and a number of branches connected via a network with the central processing site. The method comprises (a) capturing at a branch images of physical document items without use of a group of physical tracer document items, (b) transferring the captured images of physical document items from the branch via the network to the central processing site, (c) receiving at the central processing site the images transferred from the branch, (d) assigning a unique entry number to all batches of document items received from the branch during a predetermined period of time, (e) creating a group of logical tracer document items based upon the assigned unique entry number, and (f) associating the group of logical tracer document items with all batches of document items received from the branch during the predetermined period of time so as to allow further downstream processing of the batches of document items at a later time.

None of the prior art including the prior art references of record discloses or suggests a method of operating a distributed image capture proof-of-deposit system having a central processing site and a number of branches connected via a network with the central processing site, wherein the method comprises, inter alia, (d) assigning a unique entry number to all batches of document items received from the branch during a predetermined period of time, (e) creating a group of logical tracer document items based upon the assigned unique entry number, and (f) associating the group of logical tracer document items with all batches of document items received from the branch during the predetermined period of time so as to allow further downstream processing of the batches of document items at a later time. Thus, claim 25 patentably defines over the prior art including the prior art references of record, whether taken singularly or in combination, and is therefore allowable.

Claim 26 recites a distributed image capture proof-of-deposit system having a central processing site and a number of branches connected via a network with the central processing site. The system comprises means for capturing at a branch images of physical document items without use of a group of physical tracer document items, means for transferring the captured images of physical document items from the branch via the network to the central processing site, means for receiving at the central processing site the images transferred from

17

the branch, means for assigning a unique entry number to all batches of document items received from the branch during a predetermined period of time, means for creating a group of logical tracer document items based upon the assigned unique entry number, and means for associating the group of logical tracer document items with the batches of document items received from the branch during the predetermined period of time so as to allow further downstream processing of the batches of document items at a later time.

None of the prior art including the prior art references of record discloses or suggests a distributed image capture proof-of-deposit system having a central processing site and a number of branches connected via a network with the central processing site, wherein the system comprises, inter alia, means for assigning a unique entry number to all batches of document items received from the branch during a predetermined period of time, means for creating a group of logical tracer document items based upon the assigned unique entry number, and means for associating the group of logical tracer document items with the batches of document items received from the branch during the predetermined period of time so as to allow further downstream processing of the batches of document items at a later time. Thus, claim 26 patentably defines over the prior art including the prior art references of record, whether taken singularly or in combination, and is therefore allowable.

In view of the foregoing, it is submitted that the application is in condition for allowance, and allowance of the application is respectfully requested.

Respectfully submitted,

Michael Chan
Reg. No. 33,663
Attorney for Applicant

NCR Corporation, Law Department, WHQ4
1700 S. Patterson Blvd., Dayton, OH 45479-0001
Tel. No. 937-445-4956/Fax No. 937-445-3733

JUN 0 7 2004

18